

ORIGINAL

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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

DEC 22 2008

United States District Court for the
District of Hawaii

at 1 o'clock and 10 min. PM
SUE BEITIA, CLERK

United States of America)	
)	
Plaintiff,)	Civil Action No. CV08-00493 SOM KSC
)	
vs.)	
)	ANSWER TO COMPLAINT
Michael W. Flaherty)	
Margaret Rona Lee Flaherty,)	
Bank of Hawaii, the State of)	
Hawaii, Department of Taxation)	
)	
Defendants)	
_____)	

ANSWER TO COMPLAINT
(Jury trial demanded)

Comes now Separate Defendant Margaret Rona Lee Flaherty and for his answer to complaint states:

1. Defendant denies the allegations contained in paragraph 1.
2. Defendant is without knowledge and information sufficient to form a belief as to the allegations contained in paragraph 2, and therefore deny same and demand strict proof of these alleged facts.
3. Defendant denies paragraph 3.
4. Defendant admits venue but denies the remainder of paragraph 4.

5. Defendant admits that she has an ownership interest in certain property. She is without knowledge as to the remainder of paragraphs 5 and 6 and demands strict proof.

6. Defendant admits paragraphs 7, 8, and 9.

7. Defendant denies paragraph 11.

8. Defendant denies paragraph 13, 14, 16, 17, 18, and 19, and demands strict proof of each such allegation.

9. Defendant admits paragraph 20, 21, 22, and 23.

10. Defendant denies paragraphs 24, 25, 26, and 27.

11. Defendant denies all paragraphs and other parts of the complaint to the extent that same are not either admitted or denied herein, and denies that the government is entitled to any relief whatsoever.

12. Defendant pleads affirmatively the defenses of homestead, spousal support and related rights, payment, limitations, failure to comply with administrative requirements including but not limited to the requirement of an assessment in compliance with regulations promulgated by the Secretary of the treasury and failure to comply with the Paperwork Reduction Acts of 1980 and 1995, failure to verify the existence of any debt, estoppel, laches, and waiver.

13. Defendant reserves the right to amend this Answer, to assert additional defenses affirmative or otherwise, and file cross or counterclaims should further discovery so warrant.

14. This matter constituting a claim for more than \$20, Defendant requests and demands a

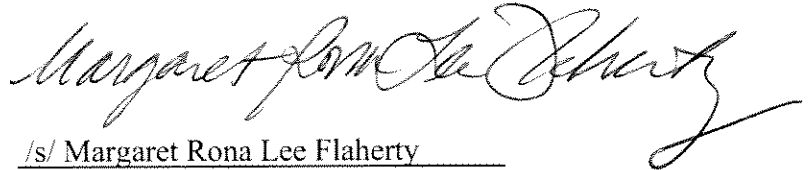
JURY TRIAL.

WHEREFORE, PREMISES CONSIDERED, Defendant prays this Court dismiss the Plaintiff's Complaint with prejudice, for costs and attorney's fees, and for all other relief to which she may

show herself entitled, whether or not specifically prayed.

Respectfully submitted,

Margaret Rona Lee Flaherty,
Separate Defendant



/s/ Margaret Rona Lee Flaherty

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CERTIFICATE OF SERVICE

I, Margaret Rona Lee Flaherty, certify by my signature above that a copy of the foregoing was delivered by first class mail this December 19, 2008 to:

Jeremy N. Hendon
US Department of Justice - Tax Division
PO Box 683
Ben Franklin Station
Washington, DC 20044-0683
Email: Jeremy.Hendon@usdoj.gov